

## REMARKS

Applicants have thoroughly considered the May 10, 2007 Final Office action. Claims 1, 11, and 17 have been amended for clarification purposes, and claims 1-25 are presented for consideration in this Amendment B. **As such, Applicants submit that this Amendment raises no new issues that would require further search and raises no issue of new matter. Rather, this Amendment places the application in better form by materially reducing or simplifying the issues for Examination or Appeal.** Applicants respectfully request that favorable reconsideration of the application in light of the following remarks and the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.

As a preliminary matter, Applicants request the Examiner indicate whether the drawings submitted on April 6, 2004 have been accepted.

### *Claim Rejection under 35 U.S.C. §102(e)*

Claims 1-25 stand rejected under 35 U.S.C. §102(e) as being anticipated by Morgan et al (US Application Publication No. 2005/0071754). The Office disagreed with Applicants' previous arguments and insisted that Morgan discloses or suggests each and every element of the invention. Applicants respectfully disagree and submit that the Office fails to give full weight to the claims as presented.

As an overview, Applicants submit that Morgan is directed to a system that pushes information to screens in a distributed system. It is directed to make information available in a number of displays or monitors and make update or change to the information available to the displays or monitors without requiring the user at each display to effect the changes. In accomplishing this, Morgan's system partitions a page containing information to be displayed into a number of panels each containing data to be displayed. Morgan's system further includes a configuration manager that centrally manages configuration data "that specifies how information is displayed across the system" (Morgan, paragraphs [0019] and [0044]). For example, the information to be displayed across the system includes flight arrival or departure information throughout the monitors near boarding gates at an airport. As this information changes in response to new arrival or departure flights, Morgan's system may centrally control and manages the display of this information on all of the display screens.

The configuration data may be used for formatting how the information is displayed. Also, “the configuration data may be stored in one or more XML configuration documents 122, or in any other desired format. The XML configuration documents 122 may specify the information contained on a panel, the panels that are included on a page, the layout of panels within a page, the client information displays 170 that display a page, the rotation sets that may be displayed on the client information displays 170, and the pages in a rotation set.” (Id., at paragraph [0026]). The configuration data is also useful, “[i]n response to the query from the page maker 140, the configuration manager 120 uses configuration data **to identify the panels in the requested page, the data from the external system necessary to create the panels, and the arrangement of the panels in the requested page** (step 525). The page specification data is sent to the page maker 140 (step 530). (emphasis added)” (Id., paragraph [0055]).

In other words, Morgan discloses and describes a system that has pushes and delivers data and information to each individual display monitors according to the specification or configuration of the configuration data.

On the other hand, embodiments of the invention covered by claims 1-25 are directed to a totally different aspect and to centrally manage configuration data across different clients where the configuration data “defines an operation of a particular client.” (Specification, paragraph [0031]). The configuration data defines an operation of a client that, among other things, provides a variety of services to users or other devices. When there is a change to the configuration data, embodiments of the invention provide an efficient way to centrally manage, update and apply the change to the configuration data on each of the clients without managing the configuration data on each individual client. Furthermore, amended claim 1 recites the following with emphasis added:

“receiving a request from a user to implement a change in configuration data, said configuration data **defining an operation** of a client;  
storing the received request in a memory area;  
requesting **topology data** from the memory area based on the configuration data, **said topology data defining a relationship between the client and the configuration data**;  
receiving the requested topology data from the memory area, said received topology data identifying the client **in response to the received request from the user**;  
identifying a notification service associated with the identified client; and  
notifying the identified notification service of the change in the configuration data, wherein notifying includes generating a notification manifest identifying the client, said notification manifest defining the change in configuration data and specifying the client affected by the change.”

By examining claim 1, Applicants submit that Morgan fails to disclose or suggest at least the following:

1. Morgan fails to disclose or suggest **receiving a request from a user to implement a change**. In fact, Morgan specifically teaches away from the invention by disclosing the change is from an **external system 160**. In addition, Morgan specifically discloses that:

“The external system 160 generates and stores underlying data 162 from which the information to be displayed is produced. In addition, the central controller 110 includes an application programming interface (API) 154 through which the external system 160 communicates with the central controller 110. Whenever data underlying the display system change [sic], the external system 160 notifies the central controller that certain data have changed through the API 154.” Morgan, paragraph [0025].

Such disclosure cannot reasonably be interpreted to disclose or suggest a user request to implement a change to configuration data. In fact, Morgan’s description clearly discusses a change in data to be displayed and not the configuration data because it is not the configuration data that is being displayed.

2. Morgan fails to disclose or suggest **a change in the configuration data**. Contrary to the Office’s assertion, Morgan does not disclose or suggest a change in the configuration data. Instead, it discloses a change in **data or information to be displayed**. The Office is directed to Morgan’s paragraph [0046] and FIG. 3 which discuss “notifying clients of a change in the data being displayed by an information display system, such as the system 100 of FIG. 1”. (Morgan, paragraph [0046]). Morgan continues to describe how the configuration manager receives notice of the “changed data” from an external system and the details about the changed data. Next, the configuration manager uses the “configuration data” (i.e., XML configuration documents) to identify “which panels contain changed data”. (*Id.*, at paragraph [0047]). In other words, the configuration data is not changed; only the data to be displayed that is changed. Therefore, Morgan cannot anticipate claim 1.

3. Morgan fails to disclose or suggest configuration data **defining an operation** of a client. Based on Morgan’s disclosure, nowhere does Morgan disclose or suggest the configuration data, which is embodied in XML documents, defines an operation of a client. Therefore, Morgan cannot anticipate claim 1.

4. Morgan also fails to disclose or suggest **“topology data from the memory area”**. The Office relies on Morgan’s paragraphs [0047] to [0048] for support of the rejection on this feature

of claim 1. Applicants respectfully disagree and argue that these paragraphs describe no more than the structure of the XML configuration documents and how a new URL is received and processed in response to the changed data. Nowhere does Morgan discuss topology data, which **defines a relationship between the client and the configuration data**, in the disclosure.

Therefore, Morgan cannot anticipate claim 1.

For at least the reasons above, Applicants submit that the Morgan cannot anticipate claim 1 and its dependent claims 2 to 10. Therefore, the rejection of claims 1-10 under 35 U.S.C. §102(e) should be withdrawn.

Similarly, claims 11 and 17, and their corresponding dependent claims 12-16 and 18-25, respectively, incorporate similar features and are also patentable over the cited art for at least the reasons above. Therefore, Applicants submit that the rejection of claims 11-25 under 35 U.S.C. §102(e) should be withdrawn. The fact that Applicants may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicants' agreement therewith.

**Applicants wish to expedite prosecution of this application. If the Examiner deems the application to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the application in condition for allowance.**

The Commissioner is hereby authorized to charge any deficiency or overpayment of any required fee during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,

/TAN-CHI YUAN/

Tan-Chi Yuan, Limited Recognition No. L0113  
SENNIGER POWERS  
One Metropolitan Square, 16th Floor  
St. Louis, Missouri 63102  
(314) 231-5400

JJB/ATY/tmg

Via EFS